UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

36951

DATE: JAN - 8 1986

SUBJECT: National Gypsum Company - Site Operations Plan - Revised November 1985

FROM Lisa Gatton, Quality Assurance Chemist
Monitoring Management Branch

TO Nigel Robinson, Project Officer
Site Investigation and Compliance Branch

I have completed my review of the revised SOP for the National Gypsum Sites and find it to be unsatisfactory again, primarily because it did not even address some of the comments I relayed to you in memos dated August 22 and September 9, 1985. The following points have yet to be addressed or need clarification.

1. No maps are provided for ground water monitoring at the Great Swamp and White Bridge Road and 257 New Vernon Road sites. How will the wells be located if there is no map?

2. The stainless steel well casings should be specified as "316". Why is a galvanized well casing being used on the upgradient well?

3. No justification has been provided on the dissolved metals issue. I strongly suggest you opt to analyze for total metals with, possibly, some dissolved metals samples being run in addition.

4. There is no justification provided for the subsurface soil sampling plan, nor has it been changed in light of our preference for seeing a random sampling plan in order to determine the "extent and magnitude of contamination of the soils, surface waters and ground waters in the vicinity of all the sites". Likewise, there is no map provided of all sites with probable subsurface sampling locations. To what depths will soil samples be taken? How will samples be collected? The filter used in sampling for dissolved metals should be specified as a 0.45 micron membrane filter. At what point in sample collection will preservatives be added?

5. I requested more detail on the Aquatic Impact Assessment (Task 11), but it was not changed at all.

6. My statement concerning the removal of any aerating device in a tap was not addressed.

7. I requested verification that both YWC, Inc. and Princeton Testing passed all parameters involved in the performance audits. This also was not addressed.

8. Table 2-2 should show a trip blank for sediments.

9. p.2-20. The coring device used to collect sediment samples should be a stainless steel or brass corer or one having a removable Teflon or glass inner liner. These will better insure the integrity of the surface layer of sediment and will minimize the loss of fine-grained material from the sediment sample.

10. I stated in my August 22 memo that the use of sodium thiosulfate is only added to volatile organics samples if residual chlorine is present. This should be the case for your potable water samples, but not for surface or ground water. Please make note of it in Table 5-2.

11. Provide the procedure the labs will use to clean sample bottles to be provided to FCHA.

12. Corrections in Table 5-2 follow.

    a. "Methods for Chemical Analysis of Water and Wastes", March 1979, March 1979, has been revised as of March 1983.

    b. The metals in soil/sediment analysis should be performed in accordance with the CLP Statement of Work for Inorganics Analysis. Multi-media, Multi-concentration, revised July 1985.

    c. The CLP Organics Statement of Work should also be referenced as the July 1985 revision.

    d. The holding times for volatile, B/N/As and pesticide/PCBs in soil/sediment under CLP protocols is 10 days until extraction, 40 days after extraction.

13. The inorganics and organic data for all matrices must be validated by FCHA according to the following protocol.

    a. Draft Inorganic Data Validation SOP, May 14, 1985.

    b. Laboratory Data Validation, Functional Guidelines for Evaluating Organics Analysis, May 28, 1985.

    c. Laboratory Data Validation, Functional Guidelines for Evaluating Pesticides/PCBs Analyses, May 28, 1985 with supplement dated June 24, 1985.

    Copies of these documents can be obtained from Pat Gillen.

14. Any sampling equipment pre-cleaned in the lab should be wrapped in heavy gauge aluminum foil for transport to the field.

15. FCHA should perform a field systems audit on their sampling personnel during the course of the audit to ensure the SOP is being followed. A copy of the resultant report should be provided to you, the project officer.

16. What, if any, is the background of this site?

Please resubmit this project plan again, only after you can assure me that all points brought out in this memo have been adequately responded to.

cc: Raymond Basso